

# Exhibit A

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
MIDLAND-ODESSA DIVISION

ROY PRUITT,

*Plaintiff,*

**V.**

**FAB TECH DOWNHOLE, LLC and  
SHANNON D. COAN**

*Defendants.*

S S S S S S S S S S S S

**C.A. No. MO:22-CV-00151-DC-RCG**

## JURY TRIAL DEMANDED

## SUPPLEMENTAL DECLARATION OF CARTER HASTINGS

I, Carter Hastings, being of sound mind and over the age of 18, make the following statements.

1. The facts contained in this declaration are within my personal knowledge and are true and correct.
2. I am an associate attorney with Anderson Alexander, PLLC, and have served as lead counsel for the Plaintiff in this case.
3. I submit this supplemental declaration in support of the Plaintiff's Supplemental Accounting of Attorneys' Fees for Plaintiff's Motion for Attorneys' Fees and Costs ("Motion").
4. This declaration supplements and does not replace the declaration filed in support of the Motion at ECF No. 42-1.
5. I have reviewed the Supplemental Accounting and the facts contained therein are true and correct.
6. Since the filing of the Motion, Plaintiff's Counsel have invested an additional twenty-eight point three (28.3) hours in the litigation of this matter, after the exercise of billing discretion, for a fee amount of \$15,175.00. I have not submitted any time that was expended on an issue upon which Plaintiff was not ultimately successful.
7. The supplemental billing records for Anderson Alexander, PLLC are hereby attached as Exhibit 1.
8. The lodestar in this matter is conservatively \$100,407.50.

9. Plaintiff has not incurred any additional costs since the filing of the Motion.
10. I declare under the penalty of perjury that the foregoing information is true and correct.

Executed on: 4/19/24 15:22 CDT

Signed by: *Carter T. Hastings*  
Carter Hastings

# Exhibit 1

Time Records for Anderson Alexander, PLLC					
Date	Time-Keeper	Task	Time	Rate	Fee
2/1/24	Carter Hastings	Updated Client on anticipated time line. Client informed me of Defendant Coans attempt to contact him personally.	0.40	\$450.00	\$ 180.00
2/2/24	Carter Hastings	Discussed case with LB and WCA, anticipated response for attorney fee motion, and discussed Defendant Coan's attempted directed communications with Plaintiff.	0.3	\$450.00	\$ 135.00
2/2/24	Lauren Braddy	Discuss status of case with C. Hastings and C. Alexander and discuss individual defendant's contacts with Plaintiff	0.3	\$550.00	\$ 165.00
2/2/24	Clif Alexander	Confer with LB and CH re Defendant's improper communications with client and discuss next steps	0.3	\$650.00	\$ 195.00
2/5/24	Lauren Braddy	Confer with litigation team regarding the sealed filing and case status and subsequently review motion, analyze effect on appellate deadlines, and discuss response	1.4	\$550.00	\$ 770.00
2/5/24	Cliff Gordon	Speak with Hastings, Braddy, and Alexander regarding sealed motion to correct/motion to effect, attention to plaintiff's position	1.4	\$550.00	\$ 770.00
2/5/24	Clif Alexander	Review sealed filing and confer with team regarding implications and strategy	1.4	\$650.00	\$ 910.00
2/5/24	Carter Hastings	Meeting over Defendants' filing with LB, WCA, and CG. Discussed what the filing could be and whether an unsealed copy had been sent to the office. Checked with office staff to see if a copy had been mailed or emailed.	0.4	\$450.00	\$ 180.00
2/5/24	Carter Hastings	Emailed Marc Williams and requested copy of the sealed motion. Read and discussed motion with WCA and LB. Discussed what our response would be and what documents or emails we needed to gather for the response.	0.1	\$450.00	\$ 45.00
2/5/24	Carter Hastings	Review Sealed Motion to Correct/Motion to Enforce and prepare skeleton outline of response	1	\$450.00	\$ 450.00
2/5/24	Lauren Braddy	Review Sealed Motion to Correct/Motion to Enforce and prepare skeleton outline of response	1.20	\$550.00	\$ 660.00
2/6/24	Carter Hastings	Call with Client updating him on status of case. Informed him of Defendants' filing.	0.4	\$450.00	\$ 180.00
2/6/24	Carter Hastings	Answered call from Marc Williams regarding Defendants' motion to stay, confirmed Plaintiff opposed such relief.	0.2	\$450.00	\$ 90.00

2/7/24	Carter Hastings	Read Defendants' motion to stay.	0.5	\$450.00	\$	225.00
2/8/24	Carter Hastings	Call with Client updating him on current status of case, informed him about Defendants' motion to stay.	0.2	\$450.00	\$	90.00
2/13/24	Cliff Gordon	Review and outline Motion to Stay	2.00	\$550.00	\$	1,100.00
2/13/24	Cliff Gordon	Draft response to Defendants' Motion to Stay	2.50	\$550.00	\$	1,375.00
2/14/24	Carter Hastings	Discussed response to the motion to stay with LB and CG.	0.3	\$450.00	\$	135.00
2/14/24	Carter Hastings	Reviewed emails, time records, and put together a detailed timeline of events for use in the Response in Opposition to Defendant's Motion to enforce.	1.2	\$450.00	\$	540.00
2/14/24	Carter Hastings	Reviewed and edited CG's draft of the Response to Motion to Stay.	0.2	\$450.00	\$	90.00
2/14/24	Lauren Brady	Perform preliminary research for response to Dets' Motion to Correct/Motion to Enforce	0.80	\$550.00	\$	440.00
2/15/24	Lauren Brady	Draft response to Defendants' Motion to Correct/Motion to Enforce	4.20	\$550.00	\$	2,310.00
2/16/24	Carter Hastings	Reviewed and edited declaration in support of response in opposition to motion to enforce.	0.5	\$450.00	\$	225.00
2/16/24	Lauren Brady	Finalize draft response to Defendants' Motion to Correct/Motion to Enforce, review and incorporate CTH's declaration, and prepare for filing	2.80	\$550.00	\$	1,540.00
2/20/24	Carter Hastings	Call with Client updating him on current status of case.	0.3	\$450.00	\$	135.00
2/21/24	Carter Hastings	Answered call from Marc Williams regarding new offer from Defendants.	0.2	\$450.00	\$	90.00
2/21/24	Carter Hastings	Meeting with AWA on case. Discussed Defendants' offer and status of the case. Jointly called client to discuss offer. Jointly called Marc Williams	1	\$450.00	\$	450.00
2/21/24	Carter Hastings	Emailled Marc Williams rejection of latest offer	0.1	\$450.00	\$	45.00
2/21/24	Austin Anderson	Confer with CTH re offer, analyze Plaintiff's position, and discuss same with client.	1.00	\$650.00	\$	650.00
2/21/24	Austin Anderson	Call with OC re defendants' settlement offer	0.20	\$650.00	\$	130.00
2/21/24	Austin Anderson	Meet with CTH re case resolution	1.00	\$650.00	\$	650.00
2/23/24	Carter Hastings	Read Reply in Support of Motion for Relief	0.5	\$450.00	\$	225.00

Total Hours	196.75
Total Fee	\$ 100,407.50
Post-Judgment Hours	28.30
Post-Judgment Fee	\$15,175.00